

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-1(b)	
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In re: BLOCKFI INC., <i>et al.</i> , Debtors. ¹	Chapter 11 Case No. 22-19361 (MBK) (Jointly Administered under a Confirmed Plan ²) Hearing Date: December 5, 2024 at 10:00 a.m. ET Objection Deadline: November 28, 2024 Oral Argument: Waived Unless Response Timely Filed

**NOTICE OF THE WIND-DOWN DEBTORS' MOTION FOR AN ORDER
LIFTING THE AUTOMATIC STAY AND/OR PLAN INJUNCTION,
TO THE EXTENT APPLICABLE, TO PERMIT PAYMENTS
UNDER THE EXCESS POLICY TOWARDS THE GLOBAL SETTLEMENT**

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Wind-Down Debtors' service address is c/o M3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

² On October 3, 2023, the Court entered an order (the "Confirmation Order") [Docket No. 1660] confirming the *Third Amended Joint Chapter 11 Plan of BlockFi Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Additional Technical Modifications)* (the "Plan") [Docket No. 1609]. Capitalized terms not otherwise defined herein shall have the meanings contained in the Plan.

PLEASE TAKE NOTICE that BlockFi Inc. and its debtor affiliates (collectively, “BlockFi” or the “Wind-Down Debtors” or the “Debtors” as applicable), by and through its proposed counsel, will move before the Honorable Michael B. Kaplan, Chief United States Bankruptcy Judge for the United States Bankruptcy Court for the District of New Jersey, Trenton Vicinage, for entry of an order substantially in the form submitted herewith, for an *Order Granting Wind-Down Debtors’ Motion Lifting the Automatic Stay and/or Plan Injunction, to the Extent Applicable, to Permit Payments Under the Excess Policy Towards the Global Settlement* (the “Motion”).

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held on **December 5, 2024 at 10:00 am ET** or as soon thereafter as counsel may be heard before Judge Kaplan at the Clarkson S. Fisher U.S. Courthouse, located at 402 East State Street, Trenton, New Jersey 08608, in Courtroom No. 8.

PLEASE TAKE FURTHER NOTICE that the Wind-Down Debtors will be relying on the Motion and that no brief is being filed since the legal basis upon which relief should be granted is set forth in the motion.

PLEASE TAKE FURTHER NOTICE that, in accordance with D.N.J. LBR 9013-2(a)(2), any objections must be filed with the Clerk of the United States Bankruptcy Court, 50 Walnut Street, 3rd Floor, Courtroom 3A, Newark, New Jersey 07102, and served upon Genova Burns, LLC, Attn: Daniel M. Stolz, Esq., 110 Allen Road, Ste. 304, Basking Ridge, New Jersey **so they are received on or before November 28, 2024.**

PLEASE TAKE FURTHER NOTICE that in the absence of any objections, the relief requested in the Motion may be granted without further notice.

[Signature page to follow.]

Respectfully Submitted,

Dated: November 15, 2024

/s/ Daniel M. Stolz

GENOVA BURNS LLC

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